

GMP:DMP
F. #2012R00720/OCDETF#NY-NYE-708

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

LUIS BELLO,
JOEL AGUILAR,
EMIL SANCHEZ,
ANA ABREU and
MARY ESTRELLA,

Defendants.

- - - - - X

I N D I C T M E N T

Cr. No. 3-3339
(T. 21, U.S.C.,
§§ 841(b)(1)(A)(ii)(II),
846, 853(a) and 853(p)
T. 18, U.S.C., §§ 982(a),
982(b), 1956(h) and 3551
et seq.)

DEARIE, J.

MANN, M.J.

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy To Distribute Cocaine)

1. In or about and between March 2011 and September 2013, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LUIS BELLO, JOEL AGUILAR and EMIL SANCHEZ together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(ii)(II); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO
(Conspiracy To Launder Money)

2. In or about and between March 2011 and September 2013, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LUIS BELLO, JOEL AGUILAR, EMIL SANCHEZ, ANA ABREU and MARY ESTRELLA, together with others, did knowingly and intentionally conspire to conduct financial transactions in and affecting interstate and foreign commerce, to wit: exchanges of United States currency, which in fact involved the proceeds of specified unlawful activity, to wit: narcotics trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the financial transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of the specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT ONE

3. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count One, the government will seek forfeiture in accordance with

Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense, including but not limited to: \$29,000, more or less, in U.S. currency seized from safe deposit box #3246 at JPMorgan Chase Bank, 2126 White Plains Road, Bronx, New York.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT TWO

5. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a), of all property, real and personal, involved in the offense, and any property traceable thereto, including but not limited to: (i) \$29,000, more or less, in U.S. currency seized from safe deposit box #3246 at JPMorgan Chase Bank, 2126 White Plains Road, Bronx, New York, 10462, on or about September 23, 2013, and (ii) a sum of money representing the amount of money involved in the offense.

6. If any of the above-described forfeitable property, as result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value;

or

e. has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

(Title 18, United States Code, Sections 982(a) and 982(b); Title 21, United States Code, Section 853(p))

A TRUE BILL

Charles E. Sparer
FOREPERSON

Loretta E. Lynch
LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2012R00720/NY-NYE-708
FORM DBD-34 No.
JUN. 85

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

LUIS BELLO, JOEL AGUILAR, EMIL
SANCHEZ, ANA ABREU and MARY ESTRELLA,
Defendants.

INDICTMENT

(T. 21, U.S.C., §§ 841(b)(1)(A)(ii)(II), 846, 853(a) and 853(p);
T. 18, U.S.C., §§ 982(a), 982(b), 1956(h) and 3551 et seq)

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20____

Clerk

Bail, \$ _____

Douglas M. Pravda, Assistant U.S. Attorney (718) 254-6268